



MEMORANDUM

September 4, 2007

TO: Michael DeVos
Executive Director
Michigan State Housing Development Authority

FROM: Jeffrey L. Brown
Executive Director
Oakland County Community Mental Health Authority (Authority)

Marc Craig
President & CEO
Community Housing Network (CHN)

Re: Michigan's Qualified Allocation Plan 2008 – 2009/ Low Income Housing Tax Credit Program

Thank you for providing us with this opportunity to give input regarding Michigan's new Qualified Allocation Plan. We commend MSHDA for making housing for people with disabilities a priority. We are particularly optimistic regarding the proposal to allocate a substantial portion of the available credits to supportive housing and homelessness. This is a significant increase from the previous QAP, and is potentially very good news for people with disabilities in our community.

As you know, the Oakland County Taskforce on Homelessness and Affordable Housing released the county's Ten Year Plan to End Homelessness in 2006. The Taskforce spent two years conducting community forums and consumer focus groups to develop the plan. During the same time frame Wayne State University was contracted by Oakland County with support from MSHDA to conduct the first comprehensive housing needs assessment which was also released in 2006. In addition, The Oakland County Community Mental Health Authority has adopted a Strategic Plan for Housing in 2006 that included the input of our community members. Each of these plans make it clear that our citizens and community leaders value social integration and inclusive communities. These values are demonstrated through our commitment to small scattered site projects dispersed throughout the county.

The plan allocates half of all available tax credits to the cities of Detroit, Hamtramck, and Highland Park. These areas are certainly in need, and we support the reasoning behind that decision. This decision does, however, limit relief to the rest of the state. Therefore we would like to see the remainder of the allocation in our area used for those needs that our community values – scattered site development that promotes the goal of socioeconomic integration across the county.

Thus we do have some concerns about the Qualified Allocation Plan:

1. There is a concern that the QAP may inadvertently direct resources toward projects that further concentrate poverty and people with disabilities.. In Oakland County, most of the limited affordable housing that is currently available is in congregate settings and concentrated in very small areas of the county. The Comprehensive Housing Needs Assessment for Oakland County recommends that affordable housing options be made available in all of Oakland County's communities to avoid concentration of poverty and promote social integration.
2. The preference toward addressing homelessness is laudable. However, the current definition of homelessness at times results in people having to become homeless before they can access affordable housing. We would like to see the definition of homelessness which states that "a person is only homeless when they are residing in a homeless shelter, on the street or in a place not meant for human habitation" changed in order to to help us target those persons with disabilities for whom there are no subsidies or other affordable housing, including those who are currently living in congregate settings, and those who have received an eviction notice.
3. At this point, we do not understand the reasoning behind the prohibition against scattered site single family housing in the special needs set aside. This prohibition runs counter to an important element of the housing development strategy in Oakland County and the stated preferences of numerous disability advocacy groups across the state. In the Oakland County Housing Needs Assessment, as well as in the Ten Year Plan to End Homelessness and the Oakland County Community Mental Health Authority's strategic housing plan, scattered site single family housing is a valued priority, and the proposed guidelines prohibit scattered site production.

We urge you to consider the clearly articulated needs and preferences of the people we serve as well as the Oakland County community input and values that have driven our comments regarding this important issue. We sincerely hope that the new QAP is a step toward a strong and productive relationship between MSHDA and the organizations supporting people with disabilities in Oakland County.

Again, we thank you for this opportunity.


